

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
ANDOWAH NEWTON,

Plaintiff,

v.

LVMH MOËT HENNESSY LOUIS  
VUITTON INC. and RODNEY C. PRATT.

Defendants.  
\_\_\_\_\_

Case No.: 23-cv-10753

**NOTICE OF MOTION FOR RELIEF FROM OR TO ALTER OR AMEND THE  
JUDGMENT, AND/OR FOR AMENDED FINDINGS**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Plaintiff's Motion for Relief from or to Alter or Amend the Judgment, and/or for Amended Findings, dated September 20, 2024, along with all prior pleadings and proceedings herein, Plaintiff Andowah Newton, through undersigned counsel, hereby moves the Court pursuant to Federal Rule of Civil Procedure 59(e) or, in the alternative, Rules 60(b) and/or 52(b), for an order (i) vacating the Judgment [ECF 54] of dismissal with prejudice; (ii) granting Plaintiff leave to replead her retaliation claims within 45 days of the Court's order on this motion (or such other period as the Court may decide); (iii) reconsidering the denial of and granting Plaintiff's Cross-Motion for Leave to Amend the Complaint [ECF 37] and permitting Plaintiff to incorporate the proposed additional claims and defendants described therein in her repleaded complaint; and/or (iv) amending or altering the Court's finding of bad faith; and (v) granting such other and further relief the Court deems just and proper.

*[signatures on the following page]*

Respectfully submitted,

DATED: September 20, 2024

/s/ Max Rodriguez  
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